



United States Department of the Interior

FISH AND WILDLIFE SERVICE
WASHINGTON, D.C. 20240

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FISH AND WILDLIFE SERVICE

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Memorandum

To: Regional Director, Region 2 (ARD/AFF)
Acting Associate
From: Director

Subject: Sonoran Pronghorn Agency Review Draft

We apologize for the delay in reviewing the subject plan. We were waiting for the new Recovery Planning Guidelines to be finalized. It is important that the Sonoran Pronghorn Recovery Plan follow the new guidelines.

We received and incorporated comments from the Division of Wildlife Ecology Research and the Environmental Protection Agency.

We offer the following comments:

1. 3.B. Present Distribution - Figure 2 should show the relationship of Federal lands to the present range.
2. 3.C. Life Zones, last paragraph - In sentence 2, should this be "provides little free water" instead of "provides free water"? This sentence is unclear.
3. 4. Population Numbers - Cite the source for the Mexico population figures.
4. 6. Reasons for Population Decline - Is overgrazing still a problem in Arizona and/or Mexico? This is not clear.
5. Part II. Recovery - The bulk of the Sonoran pronghorn historic and present range is in Mexico. Therefore, it seems critical that Mexico develop a comprehensive management or recovery plan. Without this eventual delisting of the Sonoran pronghorn would be highly unlikely and the best that could be hoped for would be reclassification to threatened in the United States. This needs to be stated more definitively.

In Part IV. The primary objective gives a population figure of 300 individuals. What is the basis for this number? How many consecutive years must this population be maintained? Should this result in reclassification or delisting provided that other threats are no longer a problem? The objective's parameters need to be quantified more.

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6. Item 131. Change "critical habitat" to "essential habitat." Critical Habitat has not been designated. Is there a need for Critical Habitat designation? Perhaps this should be a separate item (recommend Critical Habitat).
7. Item 2111. The Sheridan project has had considerable experience in capturing, marking, and radio-tracking pronghorns. Every reasonable technique has undoubtedly been tried. Techniques already tried and proven should be used on Sonoran pronghorns. This should be discussed in the Recovery Outline Narrative.
8. Item 221. Add "if warranted" after "21." Delete "if warranted" in items 2211 through 2216.
9. Add items 2211 through 2215, 22151 through 2216, 2341 through 2343, and 2351 through 2354 to the Recovery Outline Narrative.
10. Review the Recovery Planning Guidelines and make appropriate changes in Part II (Recovery) and Part III (Implementation Schedule).
11. Implementation Schedule - Dr. Bart O'Gara, Leader of the Montana Cooperative Wildlife Research Unit, indicated that pronghorns apparently eat so much cholla that their feces are full of oxalic acid crystals. Enhancing the water supply by boring a couple of wells could only benefit the species. The fact that they can exist a good part of the year without water does not mean that it is the best thing for the animals. This might be a possible item (2213) for implementation the first 3 to 5 years.

We hope these comments will assist you in completing the final draft. Please send one copy of the final draft and a signature page for approval.

